

IN THE UNITED STATES BANKRUPTCY COURT FOR  
THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division

In re:

CIRCUIT CITY STORES, INC., *et al.*,  
Debtors.

Case No. 08-35653-KRH  
Chapter 11  
(Jointly Administered)

**MOTION TO ADMIT THOMAS O. BEAN PRO HAC VICE**

Pursuant to Local Bankruptcy Rule 2090-1(E)(2), Sheila deLa Cruz (the “Movant”), a member in good standing of the Bar of the Commonwealth of Virginia and the United States Bankruptcy Court for the Eastern District of Virginia, files this motion with the Court for an Order permitting admission of Thomas O. Bean, Esquire, of the law firm of McDermott Will & Emery LLP, 28 State Street, Boston, MA 02109-1775, to appear and practice *pro hac vice* on behalf of Horizon Technology, LLC in the Chapter 11 bankruptcy proceedings commenced by the Debtors and the related adversary proceeding styled *Siegel v. Horizon Technology, LLC* (Adv. Pro. No. 10-03322) (the “Adversary Proceeding”). In support thereof, the Movant states the following:

1. Thomas O. Bean is an attorney licensed to practice law in the Commonwealth of Massachusetts and is a member in good standing of the Massachusetts Bar. A true and accurate copy of his *pro hac vice* application is attached hereto as **Exhibit A**.

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Sheila deLa Cruz (VSB No. 65395)  
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2. Mr. Bean is also admitted to practice before the United States District Court for the District of Massachusetts.

3. He is not the subject of any pending disciplinary or grievance proceedings.

4. Mr. Bean has read and shall be governed by the local rules of this Court, the rules of professional conduct and all other requirements governing the professional behavior of members of the Virginia Bar.

**WHEREFORE**, the Movant respectfully requests the entry of the order attached hereto as **Exhibit B**, authorizing Thomas O. Bean to appear *pro hac vice* in these jointly administered cases and the related Adversary Proceeding only, and for such other and further relief as the Court deems just and proper.

Dated: February 8, 2011

HORIZON TECHNOLOGY, LLC

By: /s/ Sheila deLa Cruz

Counsel

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and

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 8th day of February, 2011, I caused a true and correct copy of the foregoing Motion to be electronically served by the Court's CM/ECF system to counsel for all necessary parties, including counsel for the Debtors, the Trustee of the Circuit City Stores, Inc. Liquidating Trust, and to the Office of the U.S. Trustee

/s/ Sheila deLa Cruz  
Counsel